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UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF NEW YORK

In re:

ROCHESTER DRUG CO-OPERATIVE, INC.

Debtor.

Advisory Trust Group, LLC, as trustee of the RDC LIQUIDATING TRUST,

Plaintiff,

v.

GLAXOSMITHKLINE LLC and GLAXOSMITHKLINE LLC f/k/a GLAXO WELLCOME,

Defendants.

Chapter 11

Case No. 20-20230 (PRW)

Adv. Proc. No. 22-02059 (PRW)

SECOND STIPULATION EXTENDING TIME TO ANSWER COMPLAINT

Plaintiff, RDC Liquidating Trust, through its trustee Advisory Trust Group, LLC ("<u>Plaintiff</u>" or the "<u>RDC Liquidating Trust</u>"), successor in interest to Rochester Drug Co-Operative, Inc. ("<u>Debtor</u>"), and defendants, Glaxosmithkline LLC and Glaxosmithkline LLC f/k/a/ Glaxo Wellcome ("<u>Defendants</u>" and, together with Plaintiff, the "<u>Parties</u>"), by and through their undersigned attorneys, hereby stipulate and agree:

WHEREAS, on February 3, 2022, Plaintiff filed a complaint (the "Complaint") against

Defendants;

WHEREAS, the summons (the "Summons") was issued on February 4, 2022;

WHEREAS, on February 4, 2022, Defendants were served with the Summons and

Complaint; and

WHEREAS, on February 11, 2022, the Parties entered into a stipulation (the "First

Stipulation") by which the time required for Defendants to answer the Complaint was extended

through and including April 15, 2022. The First Stipulation was approved by order entered

February 16, 2022.

The Parties hereby stipulate and agree to the matters set forth below:

1. The Parties continue to negotiate and exchange information and have agreed, subject

to Court approval, to further extend the time for the Defendants to answer the Complaint to and

including July 15, 2022.

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Dated: March 29, 2022 Dated: March 25, 2022 PACHULSKI STANG ZIEHL & JONES LLP MORGAN, LEWIS & BOCKIUS LLP /s/ Ilan D. Scharf Bradford J. Sandler (NY Bar No. 4499877) John C. Goodchild, III (NY Bar No. 564398) Ilan D. Scharf (NY Bar No. 4042107) Nakisha Duncan (NY Bar No. 5618996) Jason S. Pomerantz (CA Bar No. 157216) 1000 Louisiana Street, Suite 4000 780 Third Avenue, 34th Floor Houston, TX 77002 New York, NY 10017 Telephone: (713) 890-5158 Telephone: (212) 561-7700 Facsimile: (713) 890-5001 bsandler@pszilaw.com Email: john.goodchild@morganlewis.com Email: nakisha.duncan@morganlewis.com ischarf@pszjlaw.com jspomerantz@pszjlaw.com Counsel to Defendants Glaxosmithkline LLC Counsel to Plaintiff RDC Liquidating Trust and Glaxosmithkline LLC f/k/a Glaxo Wellcome SO ORDERED: DATED: HON, PAUL R. WARREN Rochester, New York United States Bankruptcy Judge

All other terms set forth in the First Stipulation remain in full force and effect.

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